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Ash Grove Cement Company/Western Region

Interoffice Memorandum

September 30, 1993

To: Ken Rone

From: Hans E. Steuch

Subject: Recycling of plant waste oil through kiln and permitting to burn whole tires

Copy to: Jerry Brown ✓

Route to: SES, NAF, DYE

In a conversation with Fred Austin today, NAF and I discussed the burning of the plants waste oil in the calciner. The oil needs to be sampled and tested for ash, lead, arsenic, cadmium, chlorides, PCB and flash point. If it is below the limits (except flash point, which needs to be higher) specified in Section 9.08 (e)(1) of PSAPCA's regulations, then it is "used oil" and we can burn it any time without an amendment to our permit.

If it is above the limits, it is classified as "waste-derived fuel" that we need to apply for a permit to burn. For the relatively small quantities that we generate and burn (less than 1 percent of fuel to kiln), Fred indicated that in this case, PSAPCA would amend our permit without requiring another source test. If we were to ask for permission to burn significant quantities of oil from other generators, a source test would be required.

There seems to be no need to run the waste oil during the upcoming stack compliance and CERMS certification test.

You may at your convenience, and if you find it worthwhile, sample and test the content of the tanks. Make sure to sample through all layers in the tanks. I think the analysis costs a few hundred dollars.

Fred also brought up the matter of permitting for tire burning. Once the upcoming source test is successfully completed, we can file an application to burn tires. It should contain some emissions data from other similar kilns burning tires (Durkee and Redding comes to mind). Fred believes PSAPCA would amend the permit for this activity and include some additional permit limits (presumably for metals emissions) to be set during a compliance test burn with tires. He mentioned that PSAPCA would likely not ask for dioxin testing but instead for a test for on the total amount of organics emitted.

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To <u>Ken/Jerry</u>	From <u>HES</u>
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